

Susan S.Q. Kalra (State Bar No. 167940)
Email: skalra@rameyfirm.com
RAMEY LLP
5020 Montrose Blvd., Suite 800
Houston, TX 77006
Telephone: (800) 993-7499

William P. Ramey, III (*pro hac vice anticipated*)
Email: wramey@rameyfirm.com
RAMEY LLP
5020 Montrose Blvd., Suite 800
Houston, TX 77006
Telephone: (713) 426-3923

Attorneys for Plaintiff Haley IP, LLC

Michael J. Zinna
Vincent M. Ferraro
Kelley Drye & Warren LLP
3 World Trade Center
175 Greenwich Street
New York, New York 10007
Telephone: (212) 808-7800
Email: mzinna@kelleydrye.com
Email: vferraro@kellydrye.com

Attorneys for Defendant Motive Technologies, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

HALEY IP, LLC,

Plaintiff,

v.

MOTIVE TECHNOLOGIES, INC.,

Defendant.

Case No.: 4:23-cv-02923-HSG

**STIPULATION AND ORDER
EXTENDING THE BRIEFING
SCHEDULE REGARDING DEFENDANT
MOTIVE TECHNOLOGIES, INC.'S
MOTION TO DISMISS THE
COMPLAINT PURSUANT TO FED.
R. CIV. P. 12(b)(6)**

Hon. Haywood S. Gilliam, Jr.

Pursuant to Local Civil Rule 6-1(b) and 6-2, Plaintiff Haley IP, LLC (“Haley”) and Defendant Motive Technologies, Inc. (“Motive”) (collectively, the “Parties”) stipulate as follows:

WHEREAS, on August 18, 2023, Motive filed a Notice of Motion and Motion to Dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(6) (“Motion”). ECF No. 50. The Motion is currently noticed to be heard before Your Honor on November 9, 2023.

WHEREAS, on August 31, 2023, the Parties agreed to extend the briefing schedule for the Motion and the Court granted the Parties’ request. ECF Nos. 53 and 54.

WHEREAS, due to prior commitments for both parties, the Parties agreed to further extend the briefing schedule for the Motion as set forth below:

- September 22, 2023: Haley’s Opposition deadline (previously September 15, 2023); and
- October 13, 2023: Motive’s Reply deadline (previously September 29, 2023).

WHEREAS, the Parties do not seek to adjourn the current hearing date for the Motion, set for November 9, 2023.

WHEREAS, the Parties have previously agreed to extend Motive’s deadline to respond to the Complaint three times (ECF Nos. 42, 44, 46), and have previously sought to amend this briefing schedule once (ECF No. 53).

WHEREAS, the proposed revised briefing schedule for Motive’s Motion will not affect the rest of the schedule for the case.

NOW THEREFORE, pursuant to Civil L.R. 6-1(b) and 6-2, the Parties, through their respective counsel, hereby stipulate as follows:

The briefing schedule for Motive's Motion is extended as follows:

- September 22, 2023: Haley's Opposition deadline; and
- October 13, 2023: Motive's Reply deadline.

IT IS SO STIPULATED AND AGREED.

Dated: September 14, 2023

Respectfully submitted,

RAMEY LLP

/s/ Susan S.Q. Kalra
Susan S.Q. Kalra (State Bar No. 167940)
Email: skalra@rameyfirm.com
RAMEY LLP
5020 Montrose Blvd., Suite 800
Houston, TX 77006
Telephone: (800) 993-7499
Fax: (832) 900-4941

Attorneys for Plaintiff Haley IP, LLC

/s/ Michael J. Zinna
Michael J. Zinna
Vincent M. Ferraro
KELLEY DRYE & WARREN LLP
3 World Trade Center
175 Greenwich Street
New York, New York 10007
Telephone: (212) 808-7800
Facsimile: (212) 808-7897
Email: mzinna@kelleydrye.com
Email: vferraro@kelleydrye.com

Attorneys for Defendant
MOTIVE TECHNOLOGIES, INC.

FILER'S ATTESTATION

I, Susan S.Q. Kalra, am the ECF user whose ID and password are being used to file this
STIPULATION AND [PROPOSED] ORDER EXTENDING THE BRIEFING
SCHEDULE REGARDING DEFENDANT MOTIVE TECHNOLOGIES, INC.'S
MOTION TO DISMISS THE COMPLAINT PURSUANT TO FED. R. CIV. P. 12(b)(6). In
compliance with Civil L.R. 5-1(h)(3), I attest that all other signatories listed, and on whose
behalf the filing is submitted, have concurred in the filing of this document.


Date: September 14, 2023

/s/ Susan S.Q. Kalra
Susan S.Q. Kalra

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 9/15/2023


HONORABLE HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT JUDGE